

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

CRIMINAL NO. 13-30236

D-1 ADAM PAUL SAVADER,

Defendant.

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ORDER BASED ON STIPULATION

This Court, having reviewed the stipulation herein below, being advised in the matter,  
and for the reasons stated by the parties,

IT IS HEREBY ORDERED that the disclosure of discovery materials are controlled by  
the provisions of the stipulation and agreement.

Dated: June 6, 2013

s/ R. Steven Whalen  
R. STEVEN WHALEN  
United States Magistrate Judge

STIPULATION BY PARTIES

The parties to the above criminal action do hereby stipulate and agree as follows:

1. Fed. R. Crim. P. 16(d) states, in part:

(1) At any time the court may, for good cause, deny, restrict, or defer discovery or inspection, or grant other appropriate relief. The court may permit a party to show good cause by a written statement that the court will inspect ex parte. If relief is granted, the court must preserve the entire text of the party's statement under seal.

2. In *Alderman v. United States*, 394 U.S. 165 (1969) the Supreme Court stated that "the trial court can and should, where appropriate, place a defendant and his counsel under enforceable orders against unwarranted disclosure of the materials which they may be entitled to inspect."

3. Prior to indictment, the government will produce subpoenas, technical reports, reports of interviews, and victim and witness statements (hereinafter, "discovery materials") which were generated during the investigation and which led to the criminal complaint in the above-entitled case (United States v. Adam Savader, 13-30236).

4. The discovery materials will be used by defense counsel only for purposes of advising his client and in trial preparation.

5. Defense counsel will not disclose any of the witness disclosure materials provided by the

government. Defense counsel will share this material only with his client, paralegals and/or investigators working with him, and only for purposes of rendering advice and trial preparation. Defense counsel will insure that materials disclosed to any of the previously described persons will not be further disclosed.

SO STIPULATED:

s/Matthew Roth  
**MATTHEW ROTH**  
Assistant United States Attorney

Dated: June 04, 2013

s/Mollie O'Rourke  
**MOLLIE O'ROURKE**  
Assistant United States Attorney

Dated: June 04, 2013

s/Michael Shoshnick  
**MICHAEL SHOSHNIK**  
Attorney for Adam Savader

Dated: June 04, 2013

I, **ADAM PAUL SAVADER**, understand the terms of this stipulation. I further agree that I will not disclose any of the discovery materials provided to me in relation to the above-entitled case. Moreover, I agree that I will not have anyone else disclose any of the discovery materials. I understand that if I, or anyone else at my direction, makes disclosures in violation of this agreement, I will be in violation of the court order and can be held in contempt of court and punished.

s/Adam Paul Savader  
**ADAM PAUL SAVADER**

Dated: June 04, 2013